

SUNSHINE PRECIOUS
METALS INCORPORATED

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SUNSHINE MINING COMPANY

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DIVISION OF
OIL GAS & MINING

August 24, 1992

Mr. D. Wayne Hedberg
Permit Supervisor
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Dear Mr. Hedberg:

RESPONSE TO JUNE 19, 1992 DOGM LETTER

The following are to address your comments of your
"Divisions" review of Sunshine Mining Companies Burgin Project,
Permit Amendment, M/049/009, Utah County, Utah.

R647-4-105 Maps, Drawings & Photographs
-105.3-

The new access road that was developed to the pit is 2,550
feet in length and has a width of 20 feet. This access road
covers 51,000 sq. feet or 1.17 acres. ✓

R647-4-107 Operation Practices ✓
-107.1- Public Safety & Welfare

Access to the active mine area will be blocked by a gate
on each road leading to the pit. These gates will be locked and
secured when mining or work at the pit is inactive. Also no
trespassing signs will be placed at the gates and,
security-watchmen, will periodically patrol the area when it is
inactive.

-107.12 Disposal of Trash, Scrap, Debris ✓

Sunshine will cleanup and remove all trash, debris, and
material related to mining at this pit. Any incidental
materials related to mining found as the old dumps are removed
will also be cleaned up.

The area above the south high wall will not be cleaned up
where the equipment from a previous operation was left. This
equipment consists of a old school bus, used as a warm-up shack
and a conveyor belt for truck loading.

-107.13 Plugging or Capping Drill Holes ✓

Sunshine will plug or cap all drill holes encountered in
the active areas of the pit that are not mined through when
operations cease at this site.

-107.14- Posting Warning Signs ✓
Warning signs will be posted at gates leading to the pit advising the public to existing highwalls.

-107.15- Constructing Berms, Fences, etc Above Highwalls
Sunshine does not currently plan to construct berms, fences, etc.. above the highwalls, see 107.1. ✓ OK - GATE S

R647-4-109 Impact Assessment ✓
-109.1- Impacts to Surface and Grouundwater Systems
The drainage will be re-established as close as possible to the original channel upon removal of the existing "lower dump."

-109.4- Slope Stability, Erosion Control, Air Quality, ✓
Safety
Any work conducted by Sunshine or its contractors, ie;, benches, etc., along, on or associated with the south highwall will be revegetated where any new disturbance occurs.

R647-4-110 Reclamation Plan
Sunshine will rip and regrade the new haul road, pit ✓
floor, and surface of the lower dump before revegetating these areas or applying any revegetation treatments.

The final design and construction of the drainage channel after the removal of the lower dump will have the capacity to hold the floor of the 25 year-6 hour storm event. The channel ✓
will be lined with rip-rap to help prevent channel scouring.

-100.5- Reveqatation Planting Program
See comments -111.13-

R647-4-11 Redamation Practices ✓
-111.1- Public Safety & Welfare
The operations at the Zuma pit will be conducted with both public safety and welfare in mind. Main emphasis will be placed on denying the public access to the active mine area by the placement of gates and signs on private access roads. Also, the area will be periodically patrolled by security guards.

-1.13- Plugging Drill Holes
Previously commented on in R647-4-107-107.1.13- ✓

-1.14- Posting Warning Signs
Previously commented on in R647-4-107-107.1.14- ✓

-1.15- Constructing Berms/Fences Above Highwalls
Previously commented on in R647-4-107-107.1.14- ✓

-111.2- Reclamation of Natural Channels
Previously commented on in -110.2-

-111.8- All Roads and Pads Reclaimed
See comments R647-4-110

-111.9- Dams and Impoundments

No dams will be constructed to impound water in the pit.
Run-on from both the north and south highwalls will only enter the pit and the major drainage will by-pass the pit to the west.

The clay in the base of the pit has a tubular structure and was used in filtering petroleum products at petroleum refineries. This crystalline structure allows water to percolate through the clays in the pit base at a rapid rate and water impoundment will be negligible.

-111.12- Topsoil Redistribution

Sunshine agrees to salvage, stockpile and redistribute virgin (undisturbed) soils that are encountered in mining activities at the Zuma pit.

-111.13- Revegetation-Adaptable Species

The seed mix recommended by your Division will cost \$14.21 per PLS# and cost \$312.62 per acre using your recommended rate, at today's current seed prices.

Sunshine is asking the Division to consider the following alternative seed mix to be applied at a rate of 17.5 PLS#.

Species	Seeding Rate (PLS lbs/acre)
'P027' Siberian Wheatgrass (Agropyron sibericum)	4
'B02015ki Russian Wildrye (Elymus junceus)	3
'Palona Indian Ricegrass (Oryzopsis hymenoides)	2
Squirreltail (Sitanion hystrix)	2
Needle & Threadgrass (Stipa comata)	0.5
Yellow Sweetclover (Melilotus officianalis)	1.0
Palmer Penstemon (Penstemon palmeri)	0.5
Prostrate kochia (Kochia prostrata)	0.5
Rubber Rabbitbrush (Chrysothamnus naureosus)	1.0
Four Wing Saltbush (Atriplex canescens)	3.0
TOTAL	17.5

R647-4-112 Variance

Sunshine would like to thank the Division for considering our request for and granting the following variances.

R647-4-111.7 Highwalls less than 45 degrees
R647-4-111.2 Topsoil Redistribution
R647-4-111.13 Revegetation standard (for pit highwalls)
R647-4-111.13 Surety

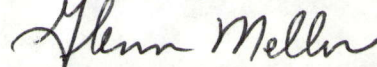
Reclamation Estimate:

Sunshine would recommend the Reclamation Estimate be changed to read 1.2 acres rather than 0.2 acre for the access road and total reclamation costs should be adjusted accordingly.

Sunshine agrees to work with the Division to reassign part of our surety bond to cover the Zuma project and recalculate our bond to 1992 dollars.

Thank you for your consideration. If the Division has any questions or requires any additional information please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn Mellor".

Glenn Mellor
Senior Geologist

GM:lr1